

DOCKET 03-CR-10367 MEL

U. S. A.

VS.

JAMES T. RICHARDS

UPDATED MOTION FOR  
PRODUCTION OF DOCUMENTS

Now comes defendant and hereby requests that this Honorable Court order the government to produce the documents it is wrongfully withholding.

he reason therefor, defendant states that when he allegedly sent the "Threatening communication" to U. S. Attorney Mike Sullivan, he also sent identical or similar packages to the media in the Boston area, similar packages to the media (newspapers) in Providence, RI; New Haven, CT; Trenton, NJ; Baltimore, MD; Dover, DE (I think); and Philadelphia, PA. I also sent similar packages or letters at the time to newspapers in Burlington, VT; Amherst, MA and Worcester, MA. I need evidence that I sent out all these letters <sup>and packages</sup> to try to shut down or interfere with businesses from Boston to Philadelphia so I can present that evidence to the psychiatrist who will be evaluating me in this case. The recipients of these packages almost certainly ~~had~~ forwarded these letters to law enforcement authorities, and ultimately the feds found out about them and/or got possession of all these letters, documents, packages and/or communications.

I would ask the court to sanction Mr. Toscas and

Graff Kelly of the FBI for withholding this evidence, ~~xxxx~~ obstructing justice, and treating this court with arrogance, high-handedness and an attitude of impunity which insults the court and clearly indicates they forget who is boss, which is the judge, usually.

Defendant hereby incorporates his accompanying affidavit in support of this motion.

Respectfully submitted,

Date: August 5, 2004

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